IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

MARK NEWBY, et. al.

Plaintiff,

V.

S

CIVIL ACTION NO. 01-CV-3624

(Consolidated)

ENRON CORPORATION, et al.

JOINDER OF THE OUTSIDE DIRECTORS DEFENDANTS TO CERTAIN DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION TO PRECLUDE THE FILING OR PRODUCTION OF DOCUMENTS SUBJECT TO A PROTECTIVE ORDER

The Outside Director Defendants respectfully join the arguments presented in the Certain Defendants Response in Opposition to Plaintiff's Motion to Preclude the Filing or Production of Documents Subject to a Protective Order.

Respectfully submitted, GIBBS& BRUNS, L.L.P.

By:

Robin C. Gibbs

State Bar No. 07853000

S.D. Tex. I.D. No. 4790

1100 Louisiana Street, Suite 5300

Houston, Texas 77002

Telephone: (713) 650-8805 Facsimile: (713) 750-0903

ATTORNEY-IN-CHARGE FOR DEFENDANTS Robert A. Belfer, Norman P. Blake, Jr., Ronnie C. Chan, John H. Duncan, Joe H. Foy, Wendy L. Gramm, Robert K. Jaedicke, Charles A. LeMaistre, John Mendelsohn, Paulo Ferraz Pereira, Frank Savage, Jerome J. Meyer, John Wakeham, Charls E. Walker and Herbert S. Winokur, Jr.

1002

OF COUNSEL:

GIBBS & BRUNS, L.L.P.
Kathy D. Patrick
State Bar No. 15581400
Jeremy L. Doyle
State Bar No. 24012553
Aundrea K. Frieden
State Bar No. 24034468
1100 Louisiana Street, Suite 5300
Houston, Texas 77002

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading was served on all counsel of record on the Service List on October 17, 2002 via posting to www.esl3624.com in compliance with the Court's Order Regarding Service of Papers and Notice of Hearings Via Independent Website.

Aundrea K. Frieden